

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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FAIR ISAAC CORPORATION,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,  
an Indiana corporation, and ACE  
AMERICAN INSURANCE COMPANY,  
a Pennsylvania corporation,

Defendants.

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Court File No. 16-cv-1054 (WMW/DTS)

**DECLARATION OF JOHN P.  
TAYLOR IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

I, John P. Taylor, declare as follows:

1. I am Senior Vice President, Finance Shared Services, at ACE American Insurance Company ("ACE American").

2. Prior to January 14, 2016, Federal Insurance Company ("Federal") and ACE American were each part of different insurance company families.

3. Federal was a subsidiary of The Chubb Corporation, part of a group of insurance entities generally known as "Chubb." ACE American was an indirect subsidiary of ACE Limited, part of a group of insurance entities generally known as "ACE."

4. Prior to January 14, 2016, Federal's direct and indirect subsidiaries included three foreign subsidiaries in Australia, Canada, and Europe: (1) the Chubb Insurance Company of Europe SE; and (2) Chubb Insurance Company of Australia Limited.; and (3) Chubb Insurance Company of Canada. Federal also had a branch office

in the United Kingdom, known as Federal Insurance Company-UK, which is not a separate legal entity.

5. Prior to January 14, 2016, Federal owned, directly or indirectly, more than 50% of the aggregate of all voting interests in Chubb Insurance Company of Europe SE, Chubb Insurance Company of Australia Ltd., and Chubb Insurance Company of Canada.

6. On or about January 15, 2016, The Chubb Corporation, Federal's parent corporation, merged with ACE INA Holdings, Inc. with ACE INA Holdings, Inc. as the name of the surviving entity. Federal thus became a subsidiary of ACE INA Holdings, Inc.

7. In March 2016, ACE INA Holdings, Inc. changed its name to Chubb INA Holdings.

8. Federal and ACE American are thus now both part of the same family of insurance companies with Chubb Limited as the ultimate parent of both.

9. As of the date of this Declaration, Chubb INA Holdings Inc. is the parent company of Federal.

10. Federal receives profits from servicing, underwriting, renewing, handling claims, marketing its products, maintaining its producer relationships, maintaining regulatory compliance, and performing the myriad of other functions related to the sale of insurance.

11. The entities listed in the chart below are not part of the same entity as the Defendants, Federal and ACE American, in this case. Rather, they are wholly separate legal entities:

<b>Writing Company</b>
Chubb Insurance Company of Australia Ltd.
Chubb Insurance Company of Europe SE
Chubb European Group SE
Chubb Insurance Company of Canada
Great Northern Insurance Company
Pacific Indemnity Company
Vigilant Insurance Company
Chubb Insurance Company of New Jersey
Executive Risk Indemnity, Inc.
Executive Risk Specialty Insurance Company
Chubb Custom Insurance Co.
ACE Fire Underwriters Insurance Co.
ACE Property and Casualty Insurance Co.
Chubb de Mexico Compania Afianzadora, S.A. de C.V.
Chubb Indemnity Insurance Co.
Chubb National Insurance Company
Chubb Seguros Brasil S.A.
Illinois Union Insurance Co.
Indemnity Insurance Co. of North America
Pacific Employers Insurance Co.
Westchester Fire Insurance Co.
Westchester Surplus Lines Insurance Co.
Chubb Insurance Australia Ltd.
Albany Insurance Company

12. Both Federal and ACE American have employed actuaries who have duties that include determining the overall target price for insurance products and premium rates, as limited by state law and other matters.

13. Both Federal and ACE American have employed underwriters who have duties that include determining whether and on what terms to write policies and undertake risks.

14. Both Federal and ACE American have employed insurance product managers who have duties that include establishing the coverages for policies and the various terms by which insurance products are sold.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: July 25, 2019



John P. Taylor